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March 15, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, *et al.*
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Chen:

This office represents the Plaintiff in the above-referenced case. Plaintiff writes jointly with all parties to respectfully request an adjournment of the motion hearing scheduled for Monday, April 29, 2024 at 11:00 AM.

The reason for the requested adjournment is because both counsel, Jamie S. Felsen, Esq., and Plaintiff's principal, Daniella Levi, Esq., have previously scheduled vacations during this time during the final day of Jewish holiday of Passover.

Plaintiff, as well as Defendants Safa Gelardi and Vito Gelardi, are mutually available to conduct the hearing on the following alternative dates: (i) Friday, May 10, 2024; and (ii) Friday, May 17, 2024, with a preference for May 10, 2024.

Pursuant to ¶ 1(G) of this Court's Individual Practices and Rules, the parties respectfully submit that:

- (i) the original date is set forth *supra*;
- (ii-iii) there have been no previous requests for an adjournment of this hearing; and
- (iv) Defendants consent and join in this request.

Accordingly, the parties respectfully submit that the instant motion to adjourn the Monday, April 29, 2024 hearing be granted, and thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
March 15, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

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*Attorneys for Plaintiff
IME WatchDog, Inc.*

Dated: Jamaica, New York
March 15, 2024

Respectfully submitted,

SAGE LEGAL LLC

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All remaining counsel of record